

**Federal Defenders
OF NEW YORK, INC.**

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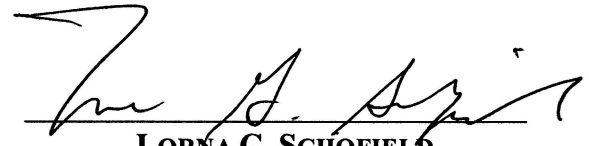
April 7, 2021

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Application Granted. All other conditions of bail shall remain in effect. The Clerk of the Court is directed to terminate the letter motion at docket number 16.

Dated: April 8, 2021
New York, New York

Re: United States v. Xavier Delacruz
21 CR 013 (LGS)


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

With the consent of the Government and the Pretrial Services Agency, I write to request that the Court modify Mr. Delacruz's conditions of release to remove the condition of home detention enforced by location monitoring, and add the condition to seek/maintain employment.

On October 8, 2020, Magistrate Judge Barbara Moses released Mr. Delacruz on bail with the following conditions, *inter alia*: A \$40,000 personal recognizance bond co-signed by two FRPs; pretrial supervision; travel limited to SDNY/EDNY; home detention with electronic monitoring. He has been fully compliant with all of the conditions of release.

Mr. Delacruz has an offer of employment with Yankee Stadium however he cannot begin working with the location monitoring condition (ankle monitor) in place. Both Pretrial Services and the Government consent to removing the condition of home detention enforced by electronic monitoring, as long as the Court adds the condition that Mr. Delacruz continue or seek employment. This latter condition would allow Pretrial to verify and monitor Mr. Delacruz's employment.

Respectfully submitted

/s/

Zawadi Baharanyi
Assistant Federal Defender
917-612-2753

So Ordered:

HONORABLE LORNA G. SCHOFELD
UNITED STATES DISTRICT JUDGE

cc: Rushmi Bhaskaran
Assistant United States Attorney